

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZUCHAER & ZUCHAER CONSULTING LLC,

Plaintiff,

-against-

PROJECT VERTE INC.,

Defendant.

PROJECT VERTE INC.

Counterclaim-Plaintiff

-against-

ZUCHAER & ZUCHAER CONSULTING, LLC, MOSHE
ZUCHAER, JOSSEF KAHLON, and TNJ HOLDINGS,
INC.

Counterclaim-Defendants

20-cv-8703-VM

**PROPOSED STIPULATION
EXTENDING TIME TO
RESPOND TO
COUNTERCLAIMS**

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: <u>2/4/2021</u>
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IT IS HEREBY STIPULATED AND AGREED, that the time for plaintiff Zuchaer & Zuchaer Consulting, LLC and Moshe Zuchaer (“Counterclaim Defendants”) to answer or otherwise move in response to the Answer With Affirmative Defenses And Counterclaims (the “Counterclaims”), filed in this action on January 11, 2021 is hereby extended to and including March 19, 2021.

Moshe Zuchaer, by his counsel, waives service of the Summons and Counterclaims, but keeps all defenses and objections, including personal jurisdiction (except any relating to the summons or to the service of the summons).

This Stipulation may be executed in counterparts, with signatures exchanged electronically (.pdf) or by fax.

Dated: New York, NY
January 28, 2021

ROSENBERG & STEINMETZ PC

SIMON•LESSER PC

By: 
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Zuchaer & Zuchaer Consulting LLC and
Moshe Zuchaer*

/s/ Leonard F. Lesser
By: _____
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plaintiff Project Verte Inc.*

SO ORDERED.	
2/4/2021	 VICTOR MARRERO, U.S.D.J.
DATE	